

# **EXHIBIT 3**

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**Sent:** Tuesday, November 21, 2023 10:08 AM

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**Subject:** RE: Curling - Meet/Confer regarding Halderman Data/Code

## External Email

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Curling Plaintiffs' Counsel:

When we discussed yesterday, we understood that to resolve the dispute, Plaintiffs would agree that they would not be performing any sort of "hack" demonstration at trial with the Dominion BMD equipment but that they would again utilize the same video submissions from the September 2020 PI Hearing. We believe this agreement will largely resolve this dispute, with the only caveat being that of the 2020 PI Hearing demonstration. In which case, we will need (a) the election files utilized for such demonstration, (b) disclosure of the make, model, and settings of the printer utilized, and (c) the programming code on the "small computer" Dr. Halderman utilized to perform his "relay attack."

At bottom, our intent here is that we will need disclosed to us the underlying technical data which will form the basis of Dr. Halderman's anticipated testimony as required by Rule 26, specifically with respect to any demonstration you intend to offer at trial applying such technical data to a component of the elections system.

We reserve all rights to object at trial, but your agreement can obviate the need for a motion in limine.

Hopefully this resolves the issue.

Let us know and thanks,  
JB

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**Josh Belinfante**

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